BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

JUN 23 1993

FEDERAL COMMUNICATIONS ZOMMISSION OFFICE OF THE SECRETARY

In re Applications of

MM DOCKET NO.

93-127

JANICE M. SCANTLAND

File No. BPH-920113MC

ROBERT G. CASAGRANDE

File No. BPH-920115ME

For a construction permit for a new FM radio station to operate

on 104.3 MHz at Richwood, OH

The Honorable Arthur I. Steinberg To: Administrative Law Judge

CONSENT MOTION FOR EXTENSION OF TIME

Robert G. Casagrande requests an extension of time from Monday, June 28, 1993 to Tuesday, July 6, 1993 to respond to the petition to enlarge issues filed against him by Mrs. Scantland. The Court granted our previous extension request by Order released June 11, 1993. This is our second (and, we represent, the last) extension request.

The petition is 25 pages in length, has exhibits identified A through KK, and requests issues regarding alleged "reporting violations, " "operational violations" and "misrepresentations" under some seven different FCC regulations with respect to approximately ten radio stations and applications for permits for radio stations. The petition arrived in our office while I was out of the city on a combined vacation and business trip to the West Coast. Upon my return the afternoon of June 16, 1993, I read the petition (along with other pleadings in this case that were generated in my absence), conferred with Mr. Casagrande, initiated the homework needed to develop factual information in response to the petition and commenced legal research concerning the issues

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which Mrs. Scantland has attempted to raise. In order to complete this homework, develop and organize the presentation of the factual responses, and draft the text of the pleading to be filed, an additional one-week period is required. This would normally call for an extension to July 5, 1993, but since that is a federal holiday, we request the extension to the following day, July 6, 1993.

Counsel for Mrs. Scantland and for the Mass Media Bureau have kindly consented to an immediate grant of the relief requested.

Respectfully submitted,

Gene A. Bechtel

Bechtel & Cole Chartered 1901 L Street, N.W. Suite 250 Washington, D.C. 20036

202/833-4190

Counsel for Robert G. Casagrande

June 23, 1993

CERTIFICATE OF SERVICE

I, Christine M. Ahearn, hereby certify that on this 23nd day of June, 1993, copies of the foregoing CONSENT MOTION FOR EXTENSION OF TIME were hand-delivered or mailed, first class, postage prepaid, to the following:

The Honorable Arthur I. Steinberg * Administrative Law Judge Federal Communications Commission 2000 L Street, N.W. -- Suite 228 Washington, D.C. 20554

Norman Goldstein, Esquire*
Hearing Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W. -- Suite 7212
Washington, D.C. 20554

Dennis F. Begley, Esquire Matthew H. McCormick, Esquire Reddy, Begley & Martin 1001 22nd Street, N.W. Suite 350 Washington, D.C. 20037

* HAND-DELIVERED

Christine M. Ahearn

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